TRAINING AND EMPLOYMENT GUIDANCE LETTER NO. 28-01

TO: ALL STATE WORKFORCE LIAISONS
              ALL STATE WORKER ADJUSTMENT LIAISONS
              ALL STATE WORKFORCE SECURITY AGENCIES
              ALL ONE-STOP CENTER SYSTEM LEADS
                              /S/
FROM: EMILY STOVER DeROCCO
              Assistant Secretary

SUBJECT: Program Guidance For Implementation of Comprehensive Youth
               Services Under the Workforce Investment Act (WIA) of 1998

1. Purpose. To provide guidance to states and local areas for Program Year 2002 youth services under the Workforce Investment Act (WIA) of 1998.

2. References.

A. Title I of the Workforce Investment Act of 1998, (Pub. Law 105-220, 29 USC 2801 et seq.); http://www.doleta.gov/usworkforce/asp/act.asp

B. Final WIA Regulations; 20 CFR parts 652, 660-671 (published at 65 Fed. Reg. 49294, August 11, 2000); http://www.doleta.gov/usworkforce/asp/act.asp

C. Training and Employment Information Notice No. 8-00, December 14, 2000, Youth Development Practitioner Apprenticeship; http://wdr.doleta.gov/directives

 D. Training and Employment Guidance Letter No. 18-00, April 23, 2001, Program Guidance For Implementation of Comprehensive Youth Services Under the Workforce investment Act; http://wdr.doleta.gov/directives

 E. Training and Employment Guidance Letter No. 12-01, February 21, 2002, Clarification on Selected Activities and Issues under the Workforce Investment Act (WIA), http://wdr.doleta.gov/directives

RESCISSIONS	EXPIRATION DATE Continuing

F. Training and Employment Guidance Letter No. 13-01, March 15, 2002, Workforce Investment Act (WIA) Allotments for Program Year (PY) 2002; Wagner-Peyser Act Preliminary Planning Estimates for PY 2002: Reemployment Services Allotments for PY 2002: and Workforce Information Grants to States for PY 2002; http://wdr.doleta.gov/directives

3. <u>Background</u>. WIA substantially reformed youth training and employment programs by shifting the program's focus from short-term training and job placement to long-term, comprehensive youth services that provide the education, skills, work experience, and support designed to help youth successfully transition to careers.   During PY 2000 states and local areas focused on making the transition to WIA by establishing governance systems and building system infrastructure to effectively deliver youth services. Activities in PY 2001 focused on fully consolidating and integrating youth services into a comprehensive program to strengthen academic achievement, enhance occupational skills training, and promote strong connections to employers and the local labor market. PY 2001 activities have resulted in increasing numbers of youth being served and steadily increasing expenditure rates when compared to PY 2000 enrollment and expenditure levels.

This Training and Employment Guidance Letter (TEGL) supplements TEGL 18-00, which provided guidance for operating PY 2001 youth programs and remains in effect for PY 2002. TEGL No. 18-00 addressed issues related to developing effective youth councils, including strategic planning, leveraging resources, identifying eligible service providers, and program oversight. It also addressed program design elements, including enhancing program quality, integrating summer and year-round activities, enhancing assessment strategies, improving recruitment efforts, developing followup services, performance management and data quality, enhancing youth connections to One-Stop systems, and job safety and health. This TEGL focuses on four major areas that state and local programs should place particular emphasis during PY 2002:

- Program goals and performance;
- Serving out-of-school youth;
- Engaging community and faith-based organizations, and
- The Youth Development Practitioner Apprenticeship initiative.

4. <u>Program Goals and Performance for PY 2002</u>
A. Goals for Youth Programs. For PY 2002, state and local areas should ensure that their youth programs provide services that:

- for in-school youth, support high academic achievement, retention in school, and graduation from high school; and

- for out-of-school youth, provide the academic and occupational skills training, support services and follow-up needed for placement and successful retention in advanced training and education or employment that provides promotional opportunities and earning gains.

Youth activities and services are expected to implement ETA's goals for WIA youth programs by:

- providing young workers with the knowledge, skills, and abilities required in the new economy;

- expanding employment opportunities by working with employers to ensure that youth employment programs provide skilled workers who are able to respond to the needs of business;

- implementing programs that are strategically managed to ensure and successful employment outcomes for youth, quality services, customer satisfaction, and a high level of efficiency and accountability in the use of grant funds;

- partnering with secondary and post-secondary schools, businesses, labor, and state and local governments to better prepare youth for career opportunities, with an emphasis on high growth job sectors; and

- conducting strong outreach activities that will engage the full participation of underutilized organizations, such as faith-based and community-based organizations, in the delivery of services to youth.

B. <u>Enhancing Program Performance</u>. WIA performance data will be an important source of information for the upcoming WIA reauthorization process. PY 2002 is the last year in which data will be available for the reauthorization process. Therefore, in PY 2002, it is critical that youth programs must exceed on the following measures:

- younger youth retention rate
- younger youth diploma rate
- older youth retention rate
- older youth credential rate

As required by the Government Performance and Results Act (GPRA), ETA has established three performance goals for WIA youth programs in PY 2002:

- 51% of 14-18 year-old youth, who enter the program without a diploma or equivalent, will attain a secondary school diploma or equivalent by the first quarter after program exit;

- 63% of 19–21 year-old youth will be employed in the first quarter after program exit; and

- 77% of 19–21 year-old youth employed in the first quarter after program exit will be employed in the third quarter after program exit.

It is very important for states and local areas to focus on these performance goals in the coming year. States should provide specific technical assistance to their local areas to ensure improved program performance. In addition to implementing the programmatic strategies outlined in this document and in last year's program guidance letter (TEGL 18-00), states and local areas should focus on maintaining quality data systems and managing performance.

States and local areas must have high quality, efficient, and accurate data collection and reporting systems in place to accurately determine the effectiveness of their programs. State level data indicates that some states and local areas continue to report inaccurate performance data. Generally, problems in the reporting process can be attributed to problems with data capture, data input, data reporting, and data validation.

- **Data Capture:** Tracking systems must ensure that all data is being captured at the participant level, both during active participation and after program exit. Failure to capture essential data will compromise the ability to accurately measure program performance.

- **Data Input:** Data must be input correctly into the database consistent with the reporting requirements.

- **Data Reporting:** Data must be accurately reported to the DOL in a timely manner. It is very important to understand the nuances of the performance measures (i.e., how they are calculated, inclusions and exclusions to the measures, etc.) in order to accurately assess program performance.

- **Data Validation:** Finally, it is essential to validate the data reported to DOL to insure the accuracy and integrity of the data. Both the aggregate reports submitted to DOL as well as the participant level data elements entered into the database should be validated. ETA is in the process of completing a WIA Data Validation Handbook that will be distributed to states.

Secondly, there are a number of strategies states and local areas can undertake to better manage the performance of their youth programs. WIA has seven performance measures, six of which measure outcomes after program exit. The best strategy for success is to maintain and monitor interim measures to assess progress. Five key interim measures to monitor are intake, participation in program elements, skill attainments, exit data, and follow-up services.

- **Intake:** Comprehensive Individual Service Strategies (ISS) should be developed that include both short-term and long-term goals. ISS goals and strategies should be updated as short-term goals are achieved or the youth's needs change. Skill attainment goals should be established for all in-school and out-of-school youth needing basic skills, work readiness skills and/or occupational skills training.

- **Participation In Program Elements:** Active participant engagement in the ten youth program elements leads to positive outcomes. In addition, specific program elements have direct impacts on certain WIA outcome measures. Thorough assessment of each individual's needs and determining which program elements impact which performance measures and monitoring to ensure participation in these activities will increase successful program outcomes. Tracking youth participation will help manage the process of keeping participants on track for completion of short-term skill attainment goals and preparation to move into long-term employment, education, or training.

- **Skill Attainment:** Closely tracking skill attainment is another interim way to monitor performance. Skill attainments, particularly in academic areas, positively correlate with both diploma acquisition and exit placement outcomes. The youth's ISS is the key tool used to track skill attainment and the successful completion of short and long-term goals, which will lead to successful program performance.

- **Exit Data:** A key piece of data to monitor is the number of participants exiting the program. Because exit is the triggering event for six of the seven youth performance measures, it is extremely important to understand the definition of exit and to monitor youth participation and promptly capture "soft exits," youth who have not participated in any activity for 90 days, as well as hard exits. Active case management, identification of multiple family/friend contact information, and frequent contact with youth participants can both reduce the number of "soft exits" and increase access to these youth during the 12-month follow-up period. Programs should strive to insure that participants do not exit the program until they complete short-term skill attainment goals and are prepared to move into long-term employment, education, or training.

- **Follow-Up Services.** Closely tracking follow-up services can not only contribute to more successful long-term outcomes for youth, but also allow for the ongoing data collection that is required to measure performance for youth. Without tracking the required follow-up services, local operators would face the burden of paying for costly follow-up surveys to track performance outcomes.

C. **Increasing Participant Service and Expenditure Levels.** PY 2000 activities focused on "system building." During PY 2001 an increasing number of youth were being served with increasing levels of expenditures. During PY 2000, 292,580 youth were enrolled in the WIA youth program nationally. Enrollments have steadily been increasing in PY 2001. For example, in the first quarter of PY 2001, 162,191 youth enrolled nationally which is more than 55% of the number of youth enrolled in the first year.

Likewise, expenditure rates for youth services have steadily increased over the past few quarters. In the third quarter of PY 2000, national youth spending totaled $136 million. Expenditures of WIA funds for youth increased to $180.2 million during the fourth quarter. This trend of increased expenditure levels for youth continued through the first quarter of PY 2001, with spending at $221.3 million.

States should effectively monitor program expenditure levels to ensure that participant service levels continue to increase. The PY 2002 funding for Youth Activities is $1,127,965,000, the same amount as PY 2001. ETA estimates that 464,800 youth will be served in PY 2002, representing an increase of approximately 22,100 more youth served than in PY 2001. This would result in an approximate cost of just over $2,400 per participant. States should continue to expend the necessary funds to serve an increased level of young people.

In addition, programs should ensure that at least 30% of their funds will be used to provide services to out-of-school youth. Analyzing both the enrollment levels of out-of-school youth, as well as their access to and use of the full range of the ten program elements, will assist states and local areas in meeting the 30% requirement.
One strategy to maximize youth access to all ten youth program elements is to develop procedures for co-enrollment in the Youth Opportunity Grants and Job Corps programs. For example, an ISS for a co-enrolled youth could include basic skills and occupational training in Job Corps. Upon graduation from Job Corps, WIA formula grants funds could be used to provide services such as further leadership training, an occupational training mentor, and support services.

Leveraging multiple youth program funding sources for needed services, including those available from other public and private organizations, can further ensure that youth will successfully achieve their educational and skills training goals. Additional information on co-enrollment can be found at the following website: www.jobcorps.org/OneStop

5. **Recruiting and Retaining Out-of-School Youth:** In PY 2002, recruiting and retaining out-of-school youth should continue to be a priority for states and local areas. WIA services for out-of-school youth should continue to focus on the provision of educational and occupational skills training that will prepare them for postsecondary education, advanced training and jobs with a career path.

During the WIA Implementation Readiness reviews, serving out-of-school youth was identified as one of the most crucial issues facing state and local programs. This finding

is further supported by the reported expenditure rates for out-of-school youth in the last two program years. For example, in PY 2000, only 15 states met the 30% out-of-school youth spending requirement, while nationally, only 22% of youth funds were expended for these youth. This trend continues during the first quarter of PY 2001.

Available data show that youth who are not in school continue to have problems connecting to the labor market, as demonstrated by the high unemployment rates for WIA's 14 to 21 year-old population. For example, for January 2002, in the critical 16 to 19 year-old range of WIA's 14 to 21 year-old population, these youth represent only 8% of the civilian population. Yet they represent twice that percentage (16%) of the unemployed population. Furthermore, for January 2002, youth in the 16 to 19 year-old range demonstrated a high unemployment rate of 16.1%. This data indicates that there is an increasing number of youth who have dropped out of school and who are lacking the necessary education and training credentials required for employment.

In June 2001, as part of the WIA Readiness Review, the Out-of-School youth workgroup confirmed that the major challenge in serving this population of youth is not identifying them, but recruiting, retaining and keeping them engaged in the program. According to the workgroup, training programs have not historically been designed to meet the needs of these youth. These programs often do not offer age-appropriate or other activities that interest youth, "get them in the door," and keep them enrolled in the program, until completion. The workgroup indicated that state and local program operators must focus on strategies to provide for necessary employment, as well as addressing need for basic skills, occupational skills, and work readiness skills. A three-pronged service strategy may be useful in serving this population:

- Help them find gainful employment (full-time or part-time), and provide available support services, such as childcare. Also, help the youth understand that securing employment opportunities and increasing one's career potential is directly related to completing education/and or skills training, and attainment of educational/employment credentials.

- While employed, provide the education and skills training needed by the youth to attain education/employment credentials, participate in post-secondary education, or become gainfully employed in a career with advancement opportunities.

- Focus on retention of those out-of-school youth engaged in the required education/skills training activities until program completion.

State and local areas should consider these suggestions when developing service strategies for the out-of-school youth population.

The Department has funded the following initiatives to encourage the recruitment and retention of out-of-school youth through improved access to an array of comprehensive

WIA services: 1) Planning Grants—Enhancing Youth Connections and Access to the One-Stop Delivery systems; and 2) the Youth Opportunity Grants.

Interim reports from the 15 One-Stop Planning grantees describe strategies being implemented to connect youth, including those not in schools, to the One-Stop system, which include: developing One-Stop Career Centers specifically designed to engage out-of-school youth; establishing convenient and extended hours for youth (e.g., youth who have jobs); conducting out-of-school youth-only forums and focus groups; and "informal presentations" by One-Stop staff in neighborhood places frequented by the out-of-school youth.

Examples of other strategies that focus on both in-school and out-of-school youth include: marketing youth-focused outreach materials; developing youth-based informational websites; One-Stop staff presentations to youth and their families in traditional and non-traditional places, such as convenience stores and laundromats; and training One-Stop front-line staff on the development of and elements required in the design of training programs for out-of-school youth.

In addition, the Youth Opportunity Grants (YOGs) have developed promising practices for recruiting, serving, and retaining out-of-school youth. These grants often offer youth a package of education, employment, and recreation activities that are more appealing than stand-alone GED classes or job training. Examples include:

- Boston YOG--implemented a sequential, multi-tiered approach to serving youth that involves: participation in community service jobs; short private sector job rotations; and working full-time in private sector placements.

- Milwaukee YOG--established Reach Institute in which an industry cluster of firms agrees to share the cost of training youth in an alternative school, and upon completion, hires the program graduates.

- Birmingham YOG--coordinates a joint program with the University of Alabama, that includes Youth "Try-Out", a 3-week rotation in different industry jobs before deciding on a longer-term job placement in a particular industry.

- Memphis YOG--has a satellite center located at a parks and recreation center for recruiting out-of-school youth, and has also established programs to help these youth prepare for the SAT and ACT college application tests.

Other innovative strategies developed by the YOGs that focus on out-of-school youth include: youth serving as outreach workers and recruiters (with incentives provided for recruiting friends into the program); working with the local juvenile justice system to sponsor alternative sentencing programs for first-time offenders; enrolling youth

returning from correctional facilities in the program; and obtaining lists of dropouts from high school, among others.

6. Engaging Community and Faith-Based Organizations. President Bush recently established the Centers for Faith-Based and Community Initiatives in key Cabinet agencies, including the Department of Labor. These Centers are charged with implementing policies and procedures that will result in the removal of unnecessary and counterproductive regulatory or administrative barriers to full participation of faith-based and other community groups, in competing for and providing a variety of federally funded social and support services in their communities.

Faith-based and community-based organizations have a long history of providing a variety of social services to the poorest communities across America. These services include day-care, after-school child care, literacy programs, food pantries, health clinics, and shelters for the homeless, to crime/gang violence prevention programs, drug counseling and prevention programs, programs for children of imprisoned parents, transportation, support services, and many more. The primary beneficiaries of these services are the children and youth residing in these neighborhoods. The provision of these services may be a critical factor in helping young people succeed in school and participate in training.

Faith and community-based grassroots organizations often serve out-of-school youth who have not been reached by other government-funded service programs. These youth may be school dropouts, deficient in basic skills, homeless or runaways, pregnant or parenting, learning disabled, or offenders. Grassroots organizations have proven to be successful in recruiting and serving these special-need populations, and assisting them in becoming productive members of society.

In PY 2002, state and local Workforce Investment Boards and Youth Councils are strongly encouraged to develop and implement creative outreach and coordination strategies, action plans and service delivery priorities to promote greater participation of faith-based and community groups in the delivery of WIA services to eligible youth. Community and faith-based organizations can play an integral role in the delivery of training services under WIA by providing tutoring, literacy and math skills, training services, community service opportunities, leadership development opportunities, adult mentoring, specific guidance and counseling, child care, transportation, housing, supportive services, among others.

The Department's regional offices facilitated three regional Youth Investment Summits last year to help local communities build comprehensive youth workforce investment systems. Local action plans and strategies were developed, which included strategies to engage the participation of underutilized service providers, such as the faith-based and community-based grassroots organizations, in the local youth workforce delivery system.

 At the national level, the Department is implementing activities designed to involve the full participation of faith-based and community-based organizations in the delivery of

youth services under WIA.   DOL has published a report, "Faith-Based Organizations Providing Employment and Training Services: A Preliminary Exploration (2002)," which documents how faith-based organizations are providing employment-related services in five communities. This report can be found at: http://wdr.doleta.gov/opr/fulltext/document.asp. Also, through an announcement in the Federal Register on April 17, ETA announced the availability of funds under three separate system-building competitions to expand customer access and build the capacity of faith-based and community-based organizations to participate in the One-Stop delivery system. Additional information on these grant solicitations and the latest DOL faith-based and community-based activities can be found at: http://www.dol.gov/cfbci/whats_new.htm. Further information on the President's Faith-Based and Community Initiative can be found at the following websites: http://www.whitehouse.gov/infocus/faith-based and http://www.whitehouse.gov/news/releases/2001.

7. Youth Development Practitioner Apprenticeship Initiative. Success in delivering services under WIA depends not only on the quality of program design, but also on the delivery of services to youth by front-line staff. The front-line youth workers develop relationships with young people and provide crucial expertise and support as they mature and enter the workforce.

In December 2000, the Department issued Training and Employment Information Notice (TEIN) Notice 8-00 announcing "The Youth Development Practitioner Apprenticeship (YDPA)" initiative. The goals of this initiative are to: 1) strengthen the field of youth work by providing training, mentoring and a career path for youth workers; and 2) improve the quality of youth services by establishing youth worker training standards, increasing the number of youth workers certified as Youth Development Practitioners, thus improving quality youth programming and increasing program stability by retaining caring and certified adult youth workers.

The YDPA initiative builds on an existing ETA project, "Youth Worker Apprenticeship: Youth Development Practitioner Apprenticeship Implementation Grant Program," for which 13 grants were awarded in June 2001. These grants are being used as seed money to establish apprenticeship programs and a national technical assistance center.

To learn more about the YDPA initiative, see TEIN No. 8-00. Information about how to set up an apprenticeship program can be located at: http://www.doleta.gov/atels_bat/setprgm.asp. For additional guidance on how to start a YDPA program, contact your state apprenticeship office (listings available at http://www.doleta.gov/atels_bat/sobat.asp). Additionally, the Sar Levitan Center at Johns Hopkins Center serves as the national technical assistance provider and national clearinghouse for the YDPA initiative. They operate a website: http://www.ydpaclearinghouse.org.

8. WIA Reauthorization. WIA will be reauthorized in FY 2003. The Department is gathering preliminary information and identifying possible key issues that may be

addressed during the reauthorization process. Through an announcement in the <u>Federal Register</u> on February 28, the Employment and Training Administration is inviting public comment on two major workforce development issues: 1) what changes should the Administration propose to Titles I, III, and V of the WIA; and 2) how can linkages between Title I of WIA and the Temporary Assistance for Needy Families program be improved. The Notice describes several methods—mail, fax, e-mail, webpage posting and public forum—through which comments could be submitted. Comments are due on or before June 30, 2002. Also, a number of WIA Reauthorization forums were held across the country, from March through May, 2002—Washington, DC; Los Angeles, CA; Philadelphia, PA; Worcester, MA; Concord, NH; New York, NY; Kansas City, MO; Dallas, TX; and Park City, Utah. More information on the forums, the Federal Register Notice, the latest developments on the Department's reauthorization activities, and other related issues may be obtained at: www.usworkforce.org/reauthorization.

We encourage states and local workforce investment areas to comment on matters they believe should be considered in the WIA reauthorization process.

9. <u>Action Required</u>. States should share the information in this TEGL with the local areas for incorporation and implementation in local program operations.

10. <u>Inquiries</u>. Questions should be directed to the appropriate regional office.